



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 19, 2020

**BY ECF AND EMAIL**

The Honorable J. Paul Oetken  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Jevgeni Bokov, et al.*, 18 Cr. 678 (JPO)**

Dear Judge Oetken:

On March 6, 2020, defendant Nikolai Niftalijev (“Niftalijev”) filed a motion seeking severance and a separate trial in the above-referenced case. (Dkt. 60). Niftalijev also filed a motion seeking a 30-day adjournment of the deadline for defense motions (March 6), as it applies to his anticipated motion seeking potential foreign Rule 15 depositions relating to the subject matter of his severance motion. The other remaining defendants in this case did not file any motions. In light of the closely related nature of Niftalijev’s severance motion and anticipated Rule 15 motion, and the current circumstances relating to COVID-19, the Government respectfully proposes, with the consent of Niftalijev’s counsel, that the Court amend the remainder of the motion schedule as follows:

- Niftalijev’s Rule 15 motion is due April 24, 2020;
- The Government’s response to both Niftalijev’s severance motion and Rule 15 motion is due May 22, 2020;
- Niftalijev’s reply in connection with both motions is due May 29, 2020; and
- The conference currently scheduled for April 8, 2020 is adjourned to a date convenient for the Court following the conclusion of the briefing schedule.

As the Court is aware, trial in this case is scheduled for September 14, 2020. The amended motion schedule proposed above will enable the defendant’s motions to be resolved well in advance of that date. Should circumstances relating to COVID-19 or otherwise

necessitate further requests for modifications to the motion schedule, the parties can make any such applications to the Court.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By:                     /s/                      
Shawn G. Crowley / George D. Turner  
Assistant United States Attorneys  
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cc: Defense counsel of record (by ECF)

Granted.  
The schedule proposed herein is adopted by the court.  
So ordered.  
March 19, 2020

  
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J. PAUL OETKEN  
United States District Judge